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October 15, 2024

Via ECF

Hon. Karen M. Williams
United States District Court
Mitchell H. Cohen U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

Re: S.S. v. Collins
United States District Court, District of New Jersey
Civ No. 23-0892

Dear Judge Williams,

Our office represents the plaintiff, S.S. I write to unfortunately once again request an additional 30 days to provide supplemental records pursuant to this Court's August 14, 2024 order.

On September 3, 2024, a subpoena for records was served on the Mid Willamette Valley Council of Governments ("MWVCOG"), Ms. Collins' employer (Exhibit 1). When our office did not receive a response, I contacted Ms. Linda Hansen, the Administrative Support Coordinator for MWVCOG. She informed me that she received the subpoena, but then gave it to directly to Ms. Collins because she mistakenly thought it was for the defendant. After our telephone call, I emailed Ms. Hansen a courtesy copy of the subpoena. This morning, I received an email from Laura Conroy, JD, an attorney from MWVCOG. She informed me that MWVCOG does not accept service via email and is now requesting the jurisdictional grounds for subpoenaing MWVCOG (see Exhibit 2).

It is our intention to provide the court with the complete records and medical report in one filing, but the roadblocks put in place by Ms. Collins and her employer has made that difficult.

I apologize to the court for the delay in concluding this matter.

Respectfully submitted,

/s/*Daniel Szalkiewicz*
By: Daniel S. Szalkiewicz, Esq.
daniel@lawdss.com

Exhibit 1

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 2:23-CV-892

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for **MWCOG**
on **9/03/2024:**

I served the subpoena by delivering a copy to the named person as follows: **Linda Hansen**, who is designated by law to accept service of process on behalf of **MWCOG** at **100 High St SE, Salem, OR 97301** on **09/03/2024 at 4:22 PM**

I delivered the documents to Linda Hansen who identified themselves as the person authorized to accept with identity confirmed by subject stating their name. The individual accepted service with direct delivery. The individual appeared to be a gray-haired white female contact 45-55 years of age, 5'6"-5'8" tall and weighing 120-140 lbs with glasses. Administrative Support Coordinator. Clerk on duty authorized to accept service, who accepted service.; or

I returned the summons unexecuted because

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ 0.00

My fees are **\$ 0.00** for travel and **\$ 95.00** for services, for a total of **\$ 95.00**.

I declare under penalty of perjury that this information is true.

Date: 09/03/2024



Server's signature

Diana Boatwright*Printed name and title*

**33141 Geranium Lane
Tangent, OR 97389**

Server's address

Additional information regarding attempted service, etc:



Tracking #: 0142065039



Exhibit 2



Daniel Szalkiewicz <daniel@lawdss.com>

RE: Subpoena for Information, 23-cv-00892-KMW-AMD S.S. v. COLLINS

1 message

Laura Conroy <lconroy@mwcog.org>
To: Daniel Szalkiewicz <daniel@lawdss.com>

Tue, Oct 15, 2024 at 1:07 PM

Mr. Szalkiewicz,

Thank you for providing this information. I will be your point of contact for all future correspondence related to this matter.

Are you able to share the jurisdictional grounds for this subpoena? It is not clear that there is long-arm jurisdiction in this matter.

Sincerely,

Laura Conroy, JD
Attorney
Mid-Willamette Valley Council of Governments

From: Daniel Szalkiewicz <daniel@lawdss.com>
Sent: Tuesday, October 15, 2024 10:02 AM
To: Laura Conroy <lconroy@mwcog.org>
Subject: Re: Subpoena for Information, 23-cv-00892-KMW-AMD S.S. v. COLLINS

External: Please report suspicious email to
security@wesd.org

Ms. Conroy,

The subpoena was personally served on Ms. Hansen on September 3, 2024. Please see the attached proof of service.

The Mid Willamette Valley Council of Governments is now in default. Please confirm the records will be produced forthwith.

--

Very Truly Yours,

Daniel S. Szalkiewicz, Esq.

Daniel Szalkiewicz & Associates, P.C.

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From: Laura Conroy <lconroy@mwvcog.org>

Date: Tuesday, October 15, 2024 at 12:59 PM

To: daniel@lawdss.com <daniel@lawdss.com>

Subject: Subpoena for Information, 23-cv-00892-KMW-AMD S.S. v. COLLINS

Dear Sir,

Please be advised the Mid Willamette Valley Council of Governments does not accept service via email.

Service may be made via certified mail or in-person service per FRCP 45.

Laura Conroy, JD
Attorney
Mid Willamette Valley Council of Governments

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